

BEVERLY JENNETT, )  
)  
Plaintiff, )  
)  
v. ) Docket No. \_\_\_\_\_  
)  
THE TRAVELERS INDEMNITY )  
COMPANY OF AMERICA, )  
)  
Defendant. )

PLEASE TAKE NOTICE that Defendant, The Travelers Indemnity Company of America removes this case to the United States District Court for the Middle District of Tennessee, Nashville Division, pursuant to 28 U.S.C. §1441 and §1446. The grounds for the removal are as follows:

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the provisions of 28 U.S.C. §1441 on the grounds that this Court has jurisdiction pursuant to 28 U.S.C. § 1332.

4. Plaintiff, Beverly Jennett alleges in the Complaint that she is a resident of Wilson County, Tennessee.

5. The Travelers Indemnity Company of America is a foreign corporation is authorized to issue property insurance within the State of Tennessee.

6. This dispute is between persons of different states and the amount in dispute between the parties is alleged to be in excess of \$75,000.00, exclusive of costs and interest; therefore, it meets the jurisdictional requirements of this Court pursuant to the provisions of 28 U.S.C. § 1332(a).

7. Venue is correct herein because Plaintiff's action is pending in Wilson County, Tennessee.

8. Counsel for this Defendant has served on Counsel for Plaintiff a Notice of Removal. Copies of the Notice of Removal and Petition for Removal have been filed in Wilson County Circuit Court by this Defendant within 30 days of service of the Complaint on Defendant.

**WHEREFORE**, please take notice that Defendant, The Travelers Indemnity Company of America removes the state action styled *Beverly Jennett v. The Travelers Indemnity Company of America*, docket number 2014CV252, from the Circuit Court of Wilson County, Tennessee, where it is now pending, to the United States District Court for the Middle District of Tennessee on this the 12<sup>th</sup> day of June, 2014.

Respectfully submitted,

**SPICER RUDSTROM, PLLC**

/s/ Marc O. Dedman

Marc O. Dedman, BPR #14044

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing has been sent via United States mail, postage prepaid, and properly addressed to:

Thompson Trial Group, P.A.  
Thomas W. Thompson, Esq.  
4725 North Lois Avenue  
Tampa, Florida 33614-7046

this 12<sup>th</sup> day of June, 2014.

/s/ Marc O. Dedman

Marc O. Dedman